

(619) 873-6852

March 20, 1998

Dorothy Rice, Deputy Director Permitting & Enforcement Division CA Integrated Waste Management Board 8800 Cal Center Drive Sacramento, CA 95826

Dear Ms. Rice:

JULIE K. BEAR SUPERVISOR 2ND DISTRICT 336 FIRST STREET BISHOP, CA 93514

After extensive investigation, and County Board discussion, Inyo County Integrated Waste Management (IWM) has the following proposals for resolving this monumental tire issue at the Bishop-Sunland Solid Waste Site (BSSWS). Because of the history of this site, and how we have inherited this mammoth tire pile from a past private operator, we are desirable of any funds that would allow us to eliminate the stock pile as fast as possible. We would then be allowed to use our limited resources to "wrap up" the remaining compliance issues at the site to meet State Minimum Operating Standards prior to the 21st. century.

Inyo County Integrated Waste Management is funded by a 1/2 cent sales tax which, until the 96/97 fiscal year, was able to provide sufficient program revenue. However, given the ever-increasing regulatory compliance issues, the Board of Supervisors committed \$247,000 from the General Fund to the solid waste program in 96/97 and \$310,000 in 97/98. The Waste Management budget of \$1,260,000 for 97/98 equates to \$70.00 per year for every man, woman and child in Inyo County. Based upon IWM's financial position and Board commitment, we would request any grant funds equaling the cost of removing the tires quickly from our site and delivering them to a recycling center. This would be the most environmentally sound action, and would help us move forward in our AB 939 requirements. Additionally, we already have in place a tire drop-off facility and a contract to take any new tires received at the site to a southern California cement plant which uses the tires as fuel. Because of the tire drop-off site, the County has not added to the tire stockpile since December 30, 1997.

As your agency is well aware, we have many long term compliance issues at not only the BSSWS, but at four additional sites in Inyo County as well. Our Board has made it very clear that we do not want to lose our LEA designation. Again, your agency's financial commitment

of \$300,000 would be extremely beneficial, and would guarantee relief so that County resources could be immediately redirected to constructing a new perimeter fence (as a result of removing the tires), and completing the cleanup work on the existing berms that Board Member Jones recommended we discontinue, which is about 50% complete. It must be made clear that the final cost of removing the tires will not be known until the project is complete.

Second option would be to provide grant monies of a quantity not sufficient to remove the entire pile, and we would request a loan to match the difference - which we could pay off in subsequent years less any potential future year grants for the diversion of tires from our landfills.

Third option would be a loan, with future payments. Hopeful of future grants to help us offset this payment and allow for more county funds to be expended on compliance issues.

Beyond this is the proposal that your Board Member Jones mentioned regarding the purchase of a piece of machinery to bale or shred the tires and dispose of them in the landfill. We feel that this is a very viable option that, over a period of time, would allow for us to come under compliance and keep our County funds within our local commerce. Unfortunately, and as Mr. Jones knows so well, we would be inheriting another function at the BSSWS that would require personnel, maintenance, and the dreaded unanticipated downtime scenarios and violation of an existing Notice & Order. Our goal right now is clear: to try to eliminate compliance issues and at the same time, not create more ongoing functions that will continue to tap our resources or slow our progress. We feel that the more effective direction to pursue is to have the tires disappear quickly.

In conclusion, I know staff are not at liberty to rule on such proposals but we would like your comments on this direction if possible. We would also be very interested if you would move this proposal forward through the proper channels so that we could address it with your board sometime as early as April if possible.

Thank you

Julie Bear.

Supervisor, 2nd District

JB/CH:vt